

RECEIVED - 041 FILED
U.S. DISTRICT COURT
DISTRICT OF PUERTO RICO

ANGEL ORTIZ ANGLERO AND REINALDO
ILARRAZA MEDINA

Plaintiffs

vs.

CROWLEY TOWING AND TRANSPORTATION
COMPANY AND SEAFARERS INTERNATIONAL
UNION OF NORTH AMERICA, ATLANTIC,
GULF, LAKES AND INLAND WATERS
DISTRICT, AFL-CIO

Defendants

* * * * *

ORLANDO RODRIGUEZ et al.

Plaintiffs

vs.

CROWLEY TOWING AND TRANSPORTATION
COMPANY AND SEAFARERS INTERNATIONAL
UNION OF NORTH AMERICA, ATLANTIC,
GULF, LAKES AND INLAND WATERS
DISTRICT, AFL-CIO

Defendants

* * * * *

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CIVIL NO. 97-2437 (CCC)

U.S. DISTRICT COURT

* SAN JUAN *

* JURY TRIAL REQUESTED

CIVIL NO. 98-1548 (CCC)

JURY TRIAL REQUESTED

MOTION IN OPPOSITION TO CROWLEY TOWING AND TRANSPORTATION CO. AND
SEAFARERS INTERNATIONAL UNION MOTIONS FOR SUMMARY JUDGMENT

TO THE HONORABLE COURT:

Plaintiffs in CIVIL NO. 97-2437, by and through counsel,
respectfully allege and pray:

1. On January 29, 1999 SEAFARERS INTERNATIONAL UNION moved
this Court, pursuant to Rule 56 of the Federal Rules of Civil
Procedures, to grant summary judgment and dismiss this action as
to SEAFARERS INTERNATIONAL UNION.

2. On January 29, 1999 CROWLEY TOWING AND TRANSPORTATION COMPANY moved this Court, pursuant to Rule 56 of the Federal Rules of Civil Procedures, to grant summary judgment and dismiss this action as to CROWLEY TOWING AND TRANSPORTATION COMPANY.

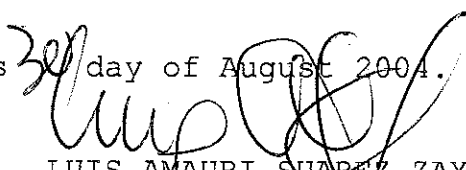
3. Both motions were accompanied by a Statement of Material Facts and supporting Memorandums of Law.

4. Plaintiffs oppose defendants' motions for summary judgment. A Statement of Material Facts and a supporting Memorandum of Law is accompanied.

WHEREFORE, plaintiffs respectfully request that the Court deny defendants' motions for summary judgment.

I certify that on this same date I sent copy of the foregoing motion to attorney Ana Rosa Biascoechea, to P.O. Box 195332, San Juan, PR 00919-5332; to attorney Raquel M. Dulcaides, to fax 751-4068 and to P.O. Box 366104, San Juan, PR 00936-6104; to Ellen Silver, Esq., 5201 Auth Way, Camp Springs, Maryland 20746 and to attorney J.H. Zidell, to fax 305-865-7167 and to City National Bank Building, 300 71 St. #605, Miami Beach, FL 33141.

Respectfully submitted, this 30th day of August 2004.


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